REMARKS

Claims 1-47 are pending.

Claims 1-47 stand rejected.

Claims 1, 10, 11, 18, 22, 28, 38, and 43 have been amended.

Claims 29 and 39 have been cancelled without prejudice or disclaimer of the subject matter recited therein.

Specification Amendments

The specification has been amended to correct two obvious errors and a spelling informality.

On page 11, line 30, "FIGURE 1" has been changed to "FIGURE 2". It is clear from the associated text that the correct reference is "FIGURE 2".

On page 13, line 28, "FIGURE 2" has been changed to "FIGURES 2 and 3". It is clear from the associated text that the correct reference is "FIGURES 2 and 3".

On page 14, line 3, "lowere" has been replaced with "lower" to correct the spelling error.

No new matter has been added.

Drawing Amendments

Applicant has enclosed a Replacement drawing sheet of Figure 1 which has been labeled "Prior Art" to overcome the Examiner's objection.

Claim Objections

Claim 10 stands objected because of a spelling error on line 2, i.e. "teh". Claim 10 has been amended to replace "teh" with "the".

Claim Rejections - 35 U.S.C. § 102

Claims 1, 2, 4, 6, 11, 17, 18, 19, 22-34, 37-39, 41-45 and 47 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Guerrero-U.S. Patent No. 6,236,400 (referred to herein as "*Guerrero*"). Applicants respectfully traverse the rejection in light of the amendments and remarks presented herein.

Guerrero addresses a problem associated with the display of file hierarchies of file systems NOT of databases of the type related to the present invention. Namely:

> Computer operating systems store information in files on a storage medium that is accessible via a file system. A file system organizes the contents of a storage device such that a user can determine the contents of the storage device. To organize files, a file hierarchy is adopted by some operating systems' file systems. Existing operating systems are inefficient in the manner in which the file hierarchy is displayed for review. For example, existing operating systems continue to display information that is no longer relevant to the user. *Guerrero*, col. 1, lines 12-21.

Guerrero teaches that:

> Embodiments of the invention provide a method and apparatus for controlling the display of hierarchical information. Hierarchical information is displayed efficiently such that information that is no longer needed is not displayed. There is no requirement that hierarchical levels through which the user has previously navigated be displayed. There is no need for the user to perform maintenance on the display to close expanded levels. Embodiments of the invention minimize the amount of display space that is wasted by prior art techniques. *Id.*, col. 3, lns. 38-47.

All of *Guerrero*'s teachings clearly relate to a "file system" context and NOT to a database context with features as set forth in the claims of the present application, e.g. i.e. database hierarchy representations where multiple sub-nodes represent database classifiers of database objects and a plurality sub-nodes in the multiple hierarchy levels represent the same database classifier representing the same database object.

The present invention of amended claim 1 relates to "A user interface for displaying database classifiers organized with multiple hierarchy levels." In contrast to the teachings of *Guerrero*, the present invention relates to (i) databases, (ii) displaying entities representing

database classifiers, and (iii) multiple entities representing the same classifiers that represent the same database object. More specifically, amended claim 1 recites:

> multiple sub-node navigation bars stacked below the root node navigation bar, each sub-node navigation bar representing a sub-node from a selected level of the multiple hierarchy levels, wherein multiple sub-nodes represent database classifiers of database objects and a plurality sub-nodes in the multiple hierarchy levels represent the same database classifier representing the same database object."

Amended claim 1 further reflects the efficient display of the sub-nodes by reciting:

> wherein the sub-node navigation bars display sub-nodes on the path from the root hierarchy level to the one or more sub-nodes having the lowest selected hierarchy level and wherein the user interface hides siblings of the displayed sub-nodes for the hierarchy levels between the root level and the hierarchy level of the one or more sub-nodes having the lowest selected hierarchy level.

Guerrero does state that:

> In one embodiment of the invention, a vertical browser is used to display hierarchical information. The vertical browser is described herein with reference to displaying hierarchical file system information. However, it should be apparent to one of ordinary skill that the vertical browser described with reference to one or more embodiments of the invention can be used to display any type of hierarchical information. *Guerrero.*, col. 6, lns. 38-46.

However, *Guerrero*'s attempt at broadening his invention *cannot* expand *Guerrero*'s teachings beyond what they teach. *Guerrero* does not include any teachings regarding databases of the type related to the present invention. With reference to claim 18 on page 5 of the Office Action, the Examiner appears to equate "a file system" with a "database". In one sense anything that stores data is a database. However, the database represented by the present invention of claim 1 is organized into a hierarchy wherein "multiple sub-nodes represent database classifiers of database objects and a plurality sub-nodes in the multiple hierarchy levels represent the same database classifier representing the same database object."

The teachings of the prior art find significant distinctions between file systems and databases. For example, "ITEC 3220 – Using and designing Database Systems" Power-point Presentation, December 1996, York University (submitted in an IDS accompanying this Response along with a courtesy copy attached to this response) with particular reference to pages

19, 27, 38, and 41, clearly distinguishes between the type of flat file system taught by *Guerrero* and the database of the present invention of amended claim 1.

Because of the significant differences between "file systems" and the types of databases related to the present invention, it would be incorrect to assert that *Guerrero* contains any inherent teachings that anticipate or render obvious the present invention of amended claim 1. The Federal Circuit has made clear that:

> For a prior art reference to anticipate a claim, the reference must disclose each and every element of the claim with sufficient clarity to prove its existence in the prior art. ... Although this disclosure requirement presupposes the knowledge of one skilled in the art of the claimed invention, that presumed knowledge does not grant a license to read into the prior art reference teachings that are not there. *Motorola, Inc v. Interdigital Tech. Corp*, 121 F.3d 1461, 43 USPQ2d 1481, 1490 (Fed. Cir. 1997).

For at least reasons similar to claim 1, the remaining independent claims 11, 18, 22, 28, 38, and 43 are also neither taught nor suggested by *Guerrero*.

Specifically, claim 11 recites in part:

> displaying a first hierarchy level having a first hierarchy database classifier label;
>
> displaying a second hierarchy level having multiple second hierarchy database classifier labels;
>
> activating one of the second hierarchy database classifier labels;
>
> displaying information associated with the activated database classifier label or a third hierarchy level having multiple third hierarchy database classifier labels; and
>
> hiding display of the unactivated second hierarchy database classifier labels;
>
> wherein multiple database classifier labels represent database objects and a plurality of database classifier labels in multiple hierarchy branches are the same database classifier label representing the same database object.

Specifically, claim 18 recites in part:

> a database having information classified by non-homogeneous classifiers organized as a root node and multiple sub-nodes;
>
> a display operable to present a user interface;

a control interfaced with the database and the display, the control operable to generate a user interface for presentation on the display, the user interface having the root node and predetermined sub-nodes stacked from highest to lowest hierarchy levels, the user interface further operable to hide predetermined sub-nodes that are not relevant to the sub-node having the lowest hierarchy level, wherein multiple sub-nodes represent database classifiers of database objects and a plurality of sub-nodes in the multiple hierarchy levels are the same database classifier representing the same database object.

Specifically, claim 22 recites:

A program product for displaying hierarchy levels of database classifiers that organize the database classifiers with multiple nodes, the program product comprising:

a storage medium that stores computer readable instructions; and

instructions stored on the storage medium, the instructions operable to command a computer to display selected nodes from first, second or third hierarchy levels, the instructions selecting for display the nodes of the first and second hierarchy levels display only the nodes of the first and second hierarchy levels on a traversed path to the third hierarchy level, wherein multiple nodes represent database classifiers of database objects and a plurality nodes in the hierarchy levels represent the same database classifier representing the same database object.

Specifically, claim 28 recites:

An electronic display of database classifiers organized with multiple hierarchy levels, the electronic display comprising:

a visual representation of a tree data structure having a root node and multiple descendant nodes; and

a visual representation of an index of data associated with a selected descendant node;

wherein the visual representation of the tree data structure displays the descendant nodes on the traversed path from the root node to the selected descendant node and conceals siblings of the descendant nodes on the traversed path; and

wherein multiple descendant nodes represent database classifiers of database objects and a plurality descendant nodes in the multiple hierarchy levels represent the same database classifier representing the same database object.

Specifically, claim 38 recites in part:

A combination tree data structure and index capable of electronic visual display of database classifiers organized by hierarchy levels, the combination tree data structure and index comprising:

a tree data structure having one or more nodes associated with each hierarchy level; and

an index of selected information associated with a selected one of the nodes, the index having a plurality of indices, each of the plurality of indices capable of displaying predetermined parts of the selected information,

wherein the siblings of the selected node and the siblings of the ancestors of the selected node are not displayed; and

wherein multiple sibling nodes represent database classifiers of database objects and a plurality of sibling nodes in the hierarchy levels represent the same database classifier representing the same database object.

Specifically, claim 43 recites in part:

displaying a tree structure having a plurality of nodes representing database classifiers;

selecting a node;

displaying the tree structure with only the selected node and the direct ancestors of the selected node; and

displaying an index associated with the selected node, the index having a plurality of indices, each of the plurality of indices having associated information representing a database object;

wherein multiple sibling nodes represent database classifiers of database objects and a plurality of sibling nodes in the hierarchy levels represent the same database classifier representing the same database object.

In light of the foregoing remarks, Applicant respectfully requests withdrawal of the rejection of independent claims 1, 11, 18, 22, 28, 38, and 43. Applicant also respectfully requests withdrawal of the rejection of the dependent claims for at least the same reasons as the independent claims upon which each indirectly or directly depends.

Claim Rejections - 35 U.S.C. § 103

Claims 5, 8-10, 15 and 46 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Guerrero* in view of Chittu et al.-U.S. Patent Publication No. 2002/0107892 (hereinafter "*Chittu*"). The rejection is respectfully traversed.

Chittu relates to:

> A dynamic tree control system includes a scripted program sent from a server, to be interpreted by a client browser. The program uses dynamic HTML and includes program code for displaying, under the control of the browser, a tree structure having one or more tree nodes in which at least a portion of data retrieved from the server is represented. The program also includes program code for dynamically altering, in response to some event, the tree structure without further accessing the server. The program also includes an event manager that registers with the browser to be notified upon the occurrence one or more events. The event manager receives notification of the event from the browser, and notifies the layer in which the event originated or took place. A notified layer response to the event, for example, by dynamically altering the tree structure. *Chittu*, Abstract.

Chittu contains no relevant teachings regarding displays representing a hierarchy of database classifiers.

Accordingly, Applicants respectfully submit that claims 5, 8-10, 15 and 46 are allowable for at least the same reasons as the independent claims upon which they directly or indirectly depend.

Claim Rejections - 35 U.S.C. § 103

Claim 7 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Guerrero* in view of Lindberg et al.-U.S. Patent No. 6,732,109 (hereinafter "*Lindberg*").

Lindberg relates to "a system for transferring information between a user interface and a database over a global information network such as the Internet." col. 2, lns. 56-58. *Lindberg* does not relate to the display of relational database tree structures and contains no teachings or suggestions to combine relational database tree structures with the file system display teachings of *Guerrero*.

Accordingly, Applicants respectfully submit that claim 7 is allowable for at least the same reasons as claim 1, upon which claim 7 indirectly depends.

Claim Rejections - 35 U.S.C. § 103

Claims 3, 12-14, 20-21, 35-36 and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Guerrero* in view of Janes et al.-U.S. Patent No. 6,642,946 (hereinafter "*Janes*").

Janes relates to:

> A livestock and material inventory system having a database storing inventory data, at least one data explorer operable to access predetermined portions of data in the database, and a graphical user interface operable to display data accessed by the at least one data explorer to a user is provided. The graphical user interface includes a first window operable to display a hierarchical tree structure representation of the inventory data, and a second window operable to display a data summary associated with a selected node in the hierarchical tree structure. *Janes*, Abstract.

Applicants respectfully submit that claims 3, 12-14, 20-21, 35-36 and 40 are allowable for at least the same reasons as the independent claims upon which they directly or indirectly depend.

Claim Rejections - 35 U.S.C. § 103

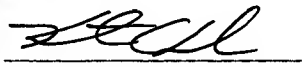
Claim 16 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Guerrero* in view of *Janes* and further in view of *Chittu*.

Applicants respectfully submit that claim 16 is allowable for at least the same reasons as claim 1, upon which claim 16 indirectly depends.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, COMMISSIONER FOR PATENTS, P.O. Box 1450, Alexandria, VA 22313-1450, on January 13, 2005.



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1-13-2005

Date of Signature

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